

EXHIBIT CC

LATHAM & WATKINS LLP

May 6, 2020

VIA EMAIL

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Re: *Grae v. Corrections Corp. of America, et al.*, No. 3:16-cv-02267

Counsel:

Pursuant to the Court's April 30, 2020 Order (Dkt. No. 211) (the "April 30 Order"), enclosed as Exhibit A is an updated privilege log that "include[s] the counsel and legal staff involved for each document withheld as privileged." *See* April 30 Order at 10, 23.

Additionally, the Court found that CORECIVIC_0959395 was not privileged. *Id.* at 20, 23. Defendants, therefore, have updated their redaction log to remove that document.¹ Defendants' updated redaction log is enclosed as Exhibit B. Because Plaintiffs have CORECIVIC_0959395 in their possession (*see* Plaintiffs' Motion to Compel, Ex. 4, Dkt. No. 196-4), Defendants are not producing another copy of that document. For purposes of identifying the document, the parties may use the document's original bates number (CORECIVIC_0959395), and can disregard the updated bates number, which was intended to identify the redacted version of the document (CORECIVIC_1795412).

¹ CORECIVIC_1795142 – the redacted version of CORECIVIC_0959395 – was removed from Defendants' redaction log.

LATHAM & WATKINS^{LLP}

With production of these updated logs, Defendants have fully complied with the Court's April 30 Order.

Best regards,

A handwritten signature in black ink, appearing to read 'Eric C. Pettis', with a stylized flourish at the end.

Eric C. Pettis
of LATHAM & WATKINS LLP

Encl.

CC: David Schindler
Brian Glennon
Sarah Tomkowiak
Steve Riley
Trey McGee
Morgan Whitworth
Dennis Herman
Willow Radcliffe
Christopher Wood
Jason Forge
Christopher Lyons